

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

INA STEINER, DAVID STEINER, and  
STEINER ASSOCIATES, LLC,

Plaintiffs,

v.

EBAY INC., ET AL.,

Defendants.

**CIVIL ACTION NO.: 1:21-CV-11181-DPW**

**AFFIDAVIT OF STEPHEN KRYSTEK IN SUPPORT OF THE MOTION FOR  
SUMMARY JUDGMENT OF PROGRESSIVE F.O.R.C.E. CONCEPTS, INC.**

I, Stephen Krystek, being duly sworn, hereby state under the pains and penalties of Perjury, state:

1. I am the CEO of the PFC Group of Companies ("PFC"). My business address is 2960 E. Sunset Road, Suite 125, Las Vegas, Nevada. I started PFC in 1997 while I was enlisted with the United States Air Force.
2. I am providing this affidavit in support of PFC's motion for summary judgment, addressing the plaintiffs' claim that PFC should have investigated Veronica Zea's use of a PFC-issued credit card at a gentlemen's club in Las Vegas.
3. After my honorable discharge from the Air Force, I moved to Las Vegas in 1999 and continued to operate and develop PFC in Las Vegas. From 1999 to 2006, I also worked as a police officer in Nevada, including for the Las Vegas Metropolitan Police department from 2001 to 2006. By 2006, however, PFC's growth required my full-time commitment, prompting me to leave the Las Vegas Metropolitan Police Department.
4. One of the companies within the PFC group, Sky Pointe Concierge, offers and provides concierge-level services to VIP and corporate clients, fulfilling and facilitating client requests that are legal and aligned with its service scope.

5. I have 25 years of experience in law enforcement and protective services in Las Vegas and am highly familiar with how businesses and corporate teams meet and entertain in the city during business-related travel.
6. Based on my personal knowledge, clients of PFC and competitors in our industry regularly hold business outings and team-building events at various Las Vegas venues, including high-end restaurants, bars, lounges, nightclubs, gentlemen's clubs, sporting events, and other entertainment locations.
7. A corporate client's team-building event at a gentlemen's club, whether charged to a PFC card, an eBay card, or an eBay employee's personal card, would not be seen as suspicious or indicative of criminal risk, and would not raise suspicions of criminal risk. If such activities were a concern, thousands of corporate teams visiting Las Vegas each month would be subject to scrutiny, which is unrealistic. Such activities and their related charges would not be flagged as illegal or suspicious by a VIP services provider like PFC, nor considered unauthorized conduct or charges by a VIP services provider like PFC unless expressly not approved or authorized by PFC's customer.

Signed under the pains and penalties of perjury this 28 day of October, 2024.



---

Stephen Krystek